1 2 3 4 5 6 7 8	Michael F. Ram, SBN #104805 Email: mram@rocklawcal.com Susan S. Brown, SBN #287986 Email: sbrown@rocklawcal.com RAM, OLSON, CEREGHINO & KOPCZYNSKI 101 Montgomery Street, Suite 1800 San Francisco, California 94104 Telephone: (415) 433-4949 Facsimile: (415) 433-7311 [Additional Counsel Appear on Signature Page] Attorneys for Plaintiffs		
10 11	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
12 13	NATHAN BURGOON and CALEB LANDERS, on behalf of themselves and all others similarly situated,	NO. 3:15-cv-01381-EMC	
14 15 16 17 18 19 20 21 22 23 24 25 26 27	Plaintiffs, vs. NARCONON OF NORTHERN CALIFORNIA d/b/a NARCONON REDWOOD CLIFFS, HALCYON HORIZONS, a California Corporation; NARCONON FRESH START d/b/a WARNER SPRINGS, a California Corporation; ASSOCIATION FOR BETTER LIVING AND EDUCATION INTERNATIONAL, a California Corporation; NARCONON WESTERN UNITED STATES, a California Corporation; NARCONON INTERNATIONAL, a California Corporation; and DOES 1-100, ROE Corporations I – X, inclusive, Defendants.	STIPULATION AND [PROPOSED] ORDER REGARDING THE AUTHENTICITY AND ADMISSIBILITY OF CERTAIN DOCUMENTS Hon. Edward M. Chen JURY TRIAL DEMAND Complaint Filed: March 25, 2015 DATE: January 4, 2016 TIME: LOCATION: Courtroom 5, 17th Floor	
•	STIPULATION AND [PROPOSED] ORDER RE AND ADMISSIBILITY OF CERTAIN DOCUM CASE No. 3:15-cv-01381-EMC		

1 I. STIPULATION 2 WHEREAS a one-day bench trial is scheduled for January 4, 2016, in which Plaintiffs 3 collectively shall have three hours to present evidence and testimony, and Defendants shall 4 collectively have three hours to present evidence and testimony; and 5 WHEREAS the parties have worked cooperatively toward an agreement that will 6 minimize the amount of foundational testimony required at the January 4, 2016 bench trial, and 7 therefore maximize the time allotted to each side to present evidence and testimony. 8 NOW THEREFORE, the parties hereby stipulate that the following documents are 9 authentic and are business records within the meaning of the Federal Rules of Evidence: 10 Documents that appear to have been created as part of ordinary business activities and 11 produced during discovery, specifically, documents with the bates ranges NNC 0001 – 12 0001120; NNFS-LANDERS_000001-000230; and IUC-LANDERS 000001-000017. 13 STIPULATED, DATED AND RESPECTFULLY SUBMITTED this 10th day of 14 December, 2015. 15 TERRELL MARSHALL LAW SCHEPER KIM & HARRIS LLP **GROUP PLLC** 16 By: /s/ Gregory A. Ellis, SBN #204478 17 By: <u>/s/ Beth E. Terrell, SBN #178181</u> David C. Scheper, SBN #120174 Beth E. Terrell, SBN #178181 18 Email: dscheper@scheperkim.com Email: bterrell@terrellmarshall.com Mary B. Reiten, SBN #203412 William H. Forman, SBN #150477 19 Email: wforman@scheperkim.com Email: mreiten@terrellmarshall.com Gregory A. Ellis, SBN #204478 Adrienne D. McEntee, Admitted Pro 20 Email: gellis@scheperkim.com Hac Vice 21 Email: amcentee@terrellmarshall.com Margaret E. Dayton, SBN #274353 Email: pdayton@scheperkim.com 936 North 34th Street, Suite 300 22 Seattle, Washington 98103-8869 601 West 5th Street, 12th Floor Telephone: (206) 816-6603 Los Angeles, California 90071 23 Facsimile: (206) 319-5450 Telephone: (213) 613-4682 Facsimile: (213) 613-4656 24 25 Attorneys for Defendants Narconon Int'l, Narconon Fresh Start d/b/a WarnerSprings 26 and Association for Better Living and Education 27 STIPULATION AND [PROPOSED] ORDER REGARDING THE AUTHENTICITY AND ADMISSIBILITY OF CERTAIN DOCUMENTS - 2

CASE No. 3:15-cv-01381-EMC

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3	RAM, OLSON, CEREGHINO & KOPCZYNSKI	Dry. /a/Thomas C. Dootty, SDN #75704
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14		
15		Attorneys for Defendants Halcyon Horizons, Inc. dba Narconon of Northern California and
16		dba Narconon Redwood Cliffs
17	II. PROPOS	FDI ORDER
18	II. 1 KO1 O5	EDJORDER
19	IT IS SO ORDERED.	
20	Dated this day of	, 20
21		ATES DISTRICT
22		
23	U	NITEY STATES DO ORDERED IT IS SO ORDERED
24 25		
26		Judge Edward M. Chen
27		
	STIPULATION AND [PROPOSED] ORDER AND ADMISSIBILITY OF CERTAIN DOCU CASE No. 3:15-cv-01381-EMC	

1 **LOCAL RULE 5-1(I)(3) STATEMENT** 2 Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this 3 document has been obtained from counsel for all parties, and that I will maintain records to 4 support this concurrence by all counsel subject to this stipulation as required under the local 5 rules. 6 DATED this 10th day of December, 2015. 7 TERRELL MARSHALL LAW GROUP PLLC 8 9 By: <u>/s/ Beth E. Terrell, SBN #178181</u> Beth E. Terrell, SBN #178181 10 Email: bterrell@terrellmarshall.com 936 North 34th Street, Suite 300 11 Seattle, Washington 98103-8869 Telephone: (206) 816-6603 12 Facsimile: (206) 319-5450 13 Attorneys for Plaintiffs 14 15 16 17 18 19 20 21 22 23 24 25 26 27 STIPULATION AND [PROPOSED] ORDER REGARDING THE AUTHENTICITY

STIPULATION AND [PROPOSED] ORDER REGARDING THE AUTHENTICITY AND ADMISSIBILITY OF CERTAIN DOCUMENTS - 4 CASE No. 3:15-cv-01381-EMC

1 CERTIFICATE OF SERVICE 2 I, Beth E. Terrell, hereby certify that on December 10, 2015, I electronically filed the 3 foregoing with the Clerk of the Court using the CM/ECF system which will send notification of 4 such filing to the following: 5 David C. Scheper, SBN #120174 Email: dscheper@scheperkim.com 6 William H. Forman, SBN #150477 Email: wforman@scheperkim.com 7 Gregory A. Ellis, SBN #204478 8 Email: gellis@scheperkim.com Margaret E. Dayton, SBN #274353 9 Email: pdayton@scheperkim.com SCHEPER KIM & HARRIS LLP 10 601 West 5th Street, 12th Floor 11 Los Angeles, California 90071 Telephone: (213) 613-4682 12 Facsimile: (213) 613-4656 13 Attorneys for Defendants Narconon Int'l, Narconon Fresh Start d/b/a WarnerSprings and Association for Better Living and Education 14 15 Dennis P. Howell, SBN #78806 Email: dphowell@grunskylaw.com 16 Rosemary Rovick Email: rrovick@grunskylaw.com 17 GRUNSKY, EBEY, FARRAR & HOWELL 240 Westgate Drive 18 Watsonville, California 95076 19 Telephone: (831) 722-2444 Facsimile: (831) 722-6153 20 Thomas G. Beatty, SBN #75794 21 Email: thomas.beatty@mcnamaralaw.com McNAMARA, NEY, BEATTY, SLATTERY, BORGES AND ARNBACHER 22 1211 Newell Avenue 23 Walnut Creek, California 94596 Telephone: (925) 939-5330 24 Facsimile: (925) 939-0203 25 Attorneys for Defendants Halcyon Horizons, Inc. dba Narconon of Northern California and dba Narconon Redwood Cliffs 26 27 STIPULATION AND [PROPOSED] ORDER REGARDING THE AUTHENTICITY AND ADMISSIBILITY OF CERTAIN DOCUMENTS - 5

CASE No. 3:15-cv-01381-EMC

1	DATED this 10th day of December, 2015.		
2	TERRELL MARSHALL LAW GROUP PLLC		
3			
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